

1 THE HONORABLE JAMES L. ROBART
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 A.H. Lundberg Associates, Inc. and Lundberg, LLC,) Case No. 14-CV-01160-JLR
11 v.)
12 TSI, Inc.,)
13 Defendant.)
14

JLR

**STIPULATED MOTION AND
[PROPOSED] ORDER EXTENDING
DEADLINES FOR REDACTIONS OF
TRIAL TRANSCRIPTS, EXPERT
REPORT, AND COURT ORDER**

15 **STIPULATED MOTION SEEKING TO EXTEND DEADLINES FOR REDACTIONS**

16 On March 9, 2017, this Court issued an Order requesting clarification on a proposed scope
17 of injunctive relief sought by Plaintiffs A.H. Lundberg Associates, Inc. and Lundberg, LLC
18 (“Lundberg”). *See* Dkt. #271. The Order set forth certain deadlines by which Lundberg and
19 Defendant TSI, Inc. (“TSI”) must meet and confer and submit additional language and briefing
20 on the injunctive relief issue. *See id.*

21 The parties also have two other upcoming deadlines:

22 (1) **March 16, 2017** - the deadline for Lundberg’s motion to redact certain portions of the
23 trial transcripts (*see* Amended General Order 15-15) and

24 (2) **March 24, 2017** - the deadline for the parties to submit statements of proposed
25 redactions to the technical expert report of Dr. Martin (“Martin report”) and the Court’s March
26 9, 2017 Order (“Order”). *See* Dkt. #271.

27 STIPULATION AND [PROPOSED] ORDER EXTENDING
DEADLINES FOR REDACTIONS - 1

1 To avoid duplicative motion practice and with the hope that the parties can agree on
2 proposed redactions, the parties respectfully request that the Court extend the deadlines on (1)
3 Lundberg's motion to redact trial transcripts and (2) the parties' statement(s) of proposed
4 redactions to the Martin report and Order to 10 days after the Court issues an order on injunctive
5 relief. The parties agree to meet and confer in this 10-day time frame. The parties also request
6 that, during this extended period, the trial transcripts, the Martin report, and the Order remain
7 non-public/sealed.

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Respectfully submitted,

10 DATED: March 14, 2017

/s/Emilia L. Sweeney
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Kenneth W. Hart, WABA No. 15511
Attorneys for Defendant TSI, Inc.

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DATED: March 14, 2017

/s/Tiffany Scott Connors
Randall P. Beighle, WABA No. 13421
Brian Bodine, WABA No. 22414
Tiffany Scott Connors, WABA No. 41740
Attorneys for Plaintiff Lundberg

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STIPULATION AND [PROPOSED] ORDER EXTENDING
DEADLINES FOR REDACTIONS - 2

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SEATTLE, WA 98111-9402
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ORDER

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IT IS SO ORDERED.

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DATED: 14 March 2017

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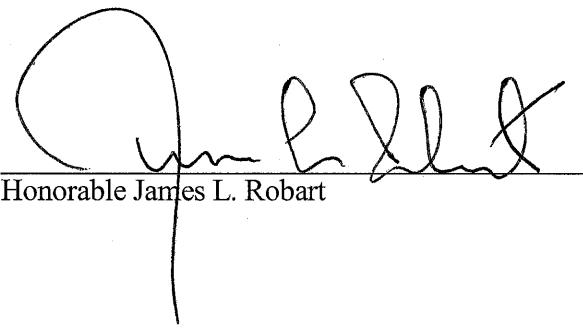
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Honorable James L. Robart

STIPULATION AND [PROPOSED] ORDER EXTENDING
DEADLINES FOR REDACTIONS - 3

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1 CERTIFICATE OF SERVICE
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3 I hereby certify under penalty of perjury of the state of Washington that on March 14,
4 2017, I caused to be served a copy of the foregoing Stipulated Motion and [Proposed] Order
5 Extending Deadlines for Redactions of Trial Transcripts, Expert Report and Court Order, to the
6 following persons in the manner indicated below at the following addresses:

7 Mr. Kenneth W. Hart by CM/ECF
8 Ms. Emilia L. Sweeney by Electronic Mail
9 Ms. Melissa J. Cunningham by Facsimile Transmission
10 Carney Badley Spellman, P.S. by First Class Mail
11 701 Fifth Avenue, Suite 3600 by Hand Delivery
12 Seattle, WA 98104-7010 by Overnight Delivery
13 Telephone: (206) 607-4174
14 Facsimile: (206) 467-8215
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norgaard@carneylaw.com
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18 Dated this 14th day of March 2017.19 s/ Ann Gabu
20 Ann Gabu, legal assistant
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27STIPULATION AND [PROPOSED] ORDER EXTENDING
DEADLINES FOR REDACTIONS - 4LANE POWELL PC
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